

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT  
OF PENNSYLVANIA**

LISA LAMBERT

V.

WILLIAM WOLFE; KEITH  
BARLETT'S ESTATE; JOHN RAUN;  
JAMES EICHER; and VICTORIA  
KORMANIC

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) Civil Action No. 96-247  
) Judge Sean J. McLaughlin  
) Magistrate Judge Susan Paradise Baxter  
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) Electronically Filed

**DEFENDANT KEITH BARTLETT'S ESTATE'S ANSWER TO COMPLAINT**

AND NOW, come the Defendants, Wolfe, Bartlett's Estate, Raun, and Kormanik by their attorneys, Thomas W. Corbett, Jr., Attorney General, Robert A. Willig, Senior Deputy Attorney General, and Susan J. Forney, Chief Deputy Attorney General, Chief Litigation Section and respectfully submit the following:

1. Plaintiff filed her complaint in this matter on August 20, 1996 pursuant to 42 U.S.C. §1983 contending that various Pennsylvania Department of Corrections (DOC) officials violated her constitutional rights (*See* Doc. # 1). DOC CPT Keith Bartlett was one of the Defendants. The Defendants filed their Answer to the Complaint on December 11, 1996 (*See* Doc. # 2).
2. This case was administratively closed from July 2000 until January 2006 while Plaintiff challenged her underlying first degree murder conviction (*See* Doc. #'s 32, 33).

3. In 2003, Keith Bartlett died (*See* Doc. # 52). By Order dated October 18, 2006, this Court permitted Plaintiff to substitute Bartlett's Estate for Bartlett (*See* Doc. # 54).

4. The Defendants filed a Motion for Partial Summary Judgment on October 26, 2006 (*See* Doc. #'s 55-57) to which Plaintiff has replied (*See* Doc. #'s 64-66).

5. The Office of the Attorney General agreed to accept service on behalf of the administrator of Bartlett's Estate. On December 18, 2006, the undersigned received a copy of the summons and the original 1996 complaint on behalf of Bartlett's Estate from Plaintiff.

6. The complaint served on Bartlett's Estate is the same complaint originally filed in this case in 1996 and the same complaint to which the defendants have already filed an answer in 1996. It is unclear to the Defendants whether they are required to file another answer to the 1996 complaint now that Bartlett's Estate is a party to this action. To the extent an answer is required, the Defendants incorporate into this answer their 1996 answer attached hereto at "Exhibit A" generally denying all allegations in the complaint and raising all applicable defenses.

WHEREFORE, the Answering Defendants request that judgment be entered in their favor and against the Plaintiff.

Respectfully submitted,

**Thomas W. Corbett, Jr.**  
Attorney General

BY: /s/ Robert A. Willig  
ROBERT A. WILLIG  
Senior Deputy Attorney General  
PA I.D. No. 53581

OFFICE OF ATTORNEY GENERAL  
6<sup>th</sup> Floor, Manor Complex  
564 Forbes Avenue  
Pittsburgh, PA 15219

Date: December 20, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within **Defendant Keith Bartlett's Estate's Answer to Complaint** was served upon the following by ECF this 20<sup>th</sup> day of December 2006:

Angus Love  
Sue Ming Yeh  
Pennsylvania Institutional Law Project  
718 Arch Street, Suite 304 South  
Philadelphia, PA 19106

I hereby certify that a true and correct copy of the within **Defendant Keith Bartlett's Estate's Answer to Complaint** was served upon the following via first class mail this 20<sup>th</sup> day of December 2006:

James Eicher  
209 McConnell Road  
New Wilmington, PA 16142

/s/ Robert A. Willig  
ROBERT A. WILLIG  
Senior Deputy Attorney General

OFFICE OF ATTORNEY GENERAL  
6<sup>th</sup> Floor, Manor Complex  
564 Forbes Avenue  
Pittsburgh, PA 15219

Date: December 20, 2006